

SH2_Answer_to_All_Cross-Claims.doc

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EASYTEX CORPORATION LIMITED,	:	ECF CASE
	:	
	:	07 CV 3907 (BSJ)
	:	
Plaintiff,	:	ANSWER BY AMERICAN
-against-	:	INTERNATIONAL LINE, INC.
PETER & FRANK OF NY, CORP., et al.,	:	<u>TO ALL CROSS-CLAIMS</u>
	:	
Defendants.	:	(Jury Demand)
	:	

Carl E. Person, appearing on behalf of the Defendant, **American International Line, Inc.**, also, sued herein under its trade name "**Mercury**" (hereinafter, "American"), respectfully **DENIES** the allegations in each of the cross claims asserted against American (by Stop & Stor, Hicksville Project, LLC s/h/a Westy Storage Centers, Korea Express USA, Inc., Top Ten Trans, Inc., GFA, Inc. and all future cross claims, if any, to be asserted by Defendants Nesson Trading, Inc., Solution USA, Inc., Gavin Fashion, Inc., JKM USA, Corp. and any all additional co-defendants to be added from time to time by the Plaintiff. The purpose of this combined and continuous pleading is to simplify the docket sheet and record, avoid mistakes, and to make sure that American has denied and continues to deny, as a continuing pleading, any and all allegations that it is liable to any co-defendant as to any cross claims, made in any initial or amended pleadings (past or future) by any co-defendant.

WHEREFORE, American respectfully requests that all cross-claims against American be dismissed in their entirety, with costs and attorneys' fees.

Jury Demand

American hereby demands a trial by jury of all issues properly triable to a jury pursuant to Rule 38(b) of the Federal Rules of Civil Procedure.

Dated: New York, New York
August 16, 2008



Carl E. Person (CP 7637)
Attorney for Defendant, American
International Line, Inc.
325 W. 45th Street - Suite 201
New York, New York 10036-3803
(212) 307-4444

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing Answer by American International Lines, Inc. to All Cross-Claims was served on the respective attorneys for the Plaintiff and Co-Defendants by causing the same to be delivered by first class mail, postage pre-paid to:

Chull S. Park, Esq. [Pltf]
Hyun Suk Choi, Esq.
The Park Law Group, LLC
23 S. Warren Street - 2nd Floor
Trenton NJ 08608

Hendrick Vandamme, Esq. [Stop&Stor]
Patrick Joseph Maloney, Esq.
Law Offices of Harvey & Vandamme
90 Broad Street – Suite 2202
New York NY 10004

David Yita Loh, Esq. [Hong, incl Hong's CrossCl]
Cozen O'Connor
45 Broadway Atrium – Suite 1600
New York NY 10006

Henry P. Gonzalez, Esq. [GFA]
Rodriguez O'Donnell Gonzalez & Williams, P.C.
1211 Connecticut Avenue, N.W. – Suite 800
Washington DC 20036

Jeffrey S. Stephens, Esq. [Westy]
Jeffrey S. Stephens, P.C.
14 Duncan Drive
Greenwich CT 06831

John Cooper Lane, Esq. [Korea]
Law Offices of John C. Lane
191 Godwin Avenue
Wyckoff NJ 07481

Peter Caccamo-Bobchin, Esq. [Westy]
Law Offices of John C. Lane
140 Broadway – 46th Fl. PMB46103
New York NY 10005

Dated: August 16, 2008

Carl E. Person (CP 7637)

